

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Jamie Hill, Kathryn Neild, and Tricia Marvin, as
representatives of a class of similarly situated
persons, and on behalf of the Mercy Health
Corporation Employees' Retirement Plan, the
Rockford Health System Retirement Plan, and the
Rockford Health Physicians Retirement Plan,

Plaintiffs,

v.

Mercy Health Corporation, Mercy Health System
Corporation, and Does 1-20,

Defendants.

Case No. 20-cv-50286

**PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND
COSTS, ADMINISTRATIVE
EXPENSES, AND CLASS
REPRESENTATIVE SERVICE
AWARDS**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on May 2, 2022 at 10:00 a.m., before the Honorable Iain D. Johnston, United States District Judge, in Courtroom 5200, Stanley J. Roszkowski United States Courthouse, 327 South Church Street, Rockford, Illinois, Plaintiffs Jamie Hill, Kathryn Neild and Tricia Marvin ("Plaintiffs") will and hereby do move this Court for an Order awarding: (1) attorneys' fees to Class Counsel in the amount of \$1,300,000 (one-third of the \$3.9 million Gross Settlement Amount); (2) reimbursement of \$40,285.52 in litigation costs and \$64,176 in settlement administration expenses; and (3) class representative service awards in the amount of \$5,000 to each of the named Plaintiffs (\$15,000 total).

This motion is made pursuant to Federal Rule of Civil Procedure 23(h) and Article 8 of the Parties' Class Action Settlement Agreement (*Dkt. 70-1*), and is based on the accompanying Memorandum of Law and authorities cited therein, the Declarations of Brock J. Specht and Paul

Secunda, the previously filed declarations of the Class Representatives (*Dkt. Nos. 66-6, 66-8, 66-10*), the Settlement Agreement, and all files, records, and proceedings in this matter.

Counsel for Plaintiffs have conferred with counsel for Defendants regarding this motion and have been advised that Defendants do not oppose the motion. As of the filing of this motion, there also have been no objections to the proposed attorneys' fees and costs, administrative expenses, or Class Representative service awards.

Dated: March 4, 2022

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s/Brock J. Specht

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2022, I caused a copy of the foregoing to be electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

Dated: March 4, 2022

s/Brock J. Specht
Brock J. Specht